



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
75 Hawthorne Street  
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October 18, 2018

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Re: Site-Wide PFAS Sampling – February 2019, Tucson International Airport Area (TIAA)  
CERCLA Site, Tucson, Arizona

Dear Sirs,

The United States Environmental Protection Agency (USEPA), in consultation with the Arizona Department of Environmental Quality (ADEQ), hereby requests that you collect and analyze groundwater samples from all monitoring wells, extraction wells, and groundwater treatment systems within your TIAA project area for poly- and perfluoroalkyl substances (PFAS) during the February 2019 site-wide groundwater sampling event.

In February-March 2018, Tucson Water collected groundwater samples from monitoring wells throughout the Tucson Airport Remediation Project (TARP) project area and found widespread PFAS ranging in concentration from non-detect to 1,006 nanograms per liter (ng/L) or parts per trillion (ppt). During the most recent sampling event, PFAS were detected at approximately 30 ppt in treated water leaving the TARP advanced oxidation process (AOP) plant. The highest concentration detected by Tucson Water was in well WR-055B immediately north of Valencia Road from the Arizona Air National Guard 162<sup>nd</sup> project area. PFAS concentrations of 214 ppt and 329.2 ppt were detected in wells WR-086S and WR-077S west of the Three Hangars area of the Airport Property. Groundwater from TARP extraction wells R-003A and R-004A contained

190 ppt and 144 ppt, respectively. The current USEPA Health Advisory for PFAS in drinking water is 70 ppt and it is expected to be revised downward later this fall or early winter.

As you probably already know, sampling and analysis of PFAS in groundwater requires special precautions to avoid cross-contamination from materials and equipment that may commonly be present in the field and laboratory. Therefore, a detailed sampling and analysis plan (SAP) specific to PFAS will need to be developed for each project area. The accepted laboratory analysis method for PFAS in drinking water is USEPA Method 537 Rev. 1. Please begin drafting a PFAS-specific SAP or amend your current SAP to include PFAS for USEPA and ADEQ review by December 3, 2018. The SAP should also include a list of wells in your project area that will be sampled for PFAS. Again though, we are requesting that all monitoring wells, extraction wells, and groundwater treatment systems are sampled.

Thank you for your attention to this matter. USEPA and ADEQ look forward to working with you to develop a robust site-wide PFAS data set so that we can begin to understand the extent and degree of PFAS contamination at the TIAA site.

Please contact me at (415) 972-3289 if you have comments or questions. In addition, if you wish to set up a conference call to discuss, let me know.

Sincerely,

*Mary T. Aycock*

Mary T. Aycock  
Remedial Project Manager  
Air Force and DOE Section (SFD-8-1)

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